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extension to Respond to Defendant's Motion for Judgment on the Pleadings. [Docket Entry 35]. Regrettably, the motion should have also requested an extension of the Court's requirement to inform the Court about the issues pertaining to Plaintiff's Motion to Compel that remained unresolved.

2. Plaintiff undertook a thorough examination of the original production (from October 5, 2020) and supplemental production on (from March 11, 2021). On March 24, 2021 undersigned counsel sent counsel for Bexar County a brief notice of the documents or other information that has not been produced. Then on March 27, 2021 plaintiff sent an **Index of Defendant's Original Production and Supplemental Production** (940 pages) identifying the portions that were not been produced. This Index has been further refined in the interim. *See* Exhibit "1". There remain important documents or information that the plaintiff properly requested by interrogatory and/or request for production that have not been answered or produced.

3. There also appears to be a pattern to the documents that have not been produced. Plaintiff has highlighted in red the portions that have clearly not been produced in order to make this easier to read. It is for these reasons that plaintiff respectfully requests that the Court reconsider its Order of March 30, 2021 and extend the period of time for the submission of plaintiff's reply to defendants' response to motion to compel.

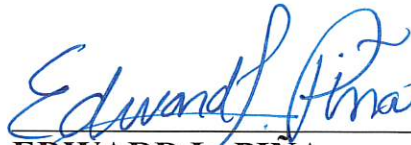
4. Plaintiff has made extensive efforts to confer on this matter at all stages of this litigation. *See* Exhibits 2, 3, 4, 5, 6. Defendants responded briefly on March 29, 2021 only to note that the ten (10) day extension by plaintiff would not be opposed and that Defendants would also not oppose plaintiff's request for a four (4) month extension of the scheduling order deadlines. *See* Exhibit 7.

#### **CERTIFICATE OF CONFERENCE**

4. On March 31, 2021, Plaintiff's counsel called and sent an e-mail to Defendants' counsel, requesting input on whether Defendants would be opposed or unopposed to this motion. A draft copy of this Motion to Reconsider Order Denying as Moot Plaintiff's Motion to Compel and for Extension was also provided on said date for purposes of conference.

WHEREFORE, premises considered Plaintiff Lisa Flanagan-Zaiontz respectfully requests entry of an order reconsidering its Order of March 30, 2021 [Docket Entry 36] and extending the period of time for the submission of plaintiff's reply to defendants' response to motion to compel.

Respectfully submitted,



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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this document has been forwarded to the following counsel of record in accordance with the Districts ECF service rules on this 1 day of April as follows:

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ATTORNEY FOR DEFENDANTS

  
**EDWARD L. PIÑA**